## UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

| In re:                | Case No.: 3:18-bk-02945-PMG |
|-----------------------|-----------------------------|
| RODNEY K. RIETTIE and |                             |
| JESSICA RIETTIE,      |                             |

Debtors.

## NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at 300 North Hogan Street, Suite 3-150, Jacksonville, Florida 32202, and serve a copy on the movant's attorney, Jerrett M. McConnell, McConnell Law Group, P.A., 6100 Greenland Rd., Unit 603, Jacksonville, FL 32258, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the granting of the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

## **OBJECTION TO CLAIM TWO (2) OF PATRICK GIBSON**

COMES NOW the Debtors, by and through their undersigned attorney, and hereby object to Claim Two (2) filed by Patrick Gibson ("Gibson"), and as grounds therefore would state:

- 1. The Proof of Claim ("POC") was filed by Gibson on August 30, 2018.
- 2. The POC alleges the Debtors owe Gibson \$100,000.00 for an alleged personal injury claim.
  - 3. Gibson's claim is contingent and unliquidated.
  - 4. Gibson failed to attach any supporting documentation to his POC.

WHEREFORE, based on the foregoing, the Debtors pray that the Court disallow Claim Two (2) of Patrick Gibson, and pray for such further relief as the Court may deem just and proper.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Debtors' Objection to Claim Two (2) was furnished to the following: Rodney and Jessica Riettie, Debtors, 85 Citrus Ridge Drive, Ponte Vedra, FL 32081; Eric S. Block, attorney for Patrick Gibson and filer of his Proof of Claim, 76 S. Laura St. Suite 1100, Jacksonville, FL 32202-5413; Douglas W. Neway, Chapter 13 Trustee, Post Office Box 4308, Jacksonville, FL 32201-4308 and the Office of the U.S. Trustee, Room 620, 135 W. Central Blvd, Orlando, FL 32801 electronically or by U. S. Mail on this 26<sup>th</sup> day of November, 2018.

MCCONNELL LAW GROUP, P.A.

/s/ Jerrett M. McConnell

JERRETT M. McCONNELL Florida Bar #0244960 6100 Greenland Rd., Unit 603 Jacksonville, FL 32258 Phone (904) 570-9180 jmcconnell@mcconnelllawgroup.com Attorney for the Debtors